



MEMORANDUM

TO: Laura Casey cc: 11.1126.1000.001.01
Diane Sinkowski
FROM: Mike Koontz Jim Buchert
DATE: June 20, 2005
SUBJECT: Request for Additional Information to Support Clariant's Inhalation Exposure and Volatilization Factor Calculations Related to Total PCBs in Carpeting from Scenarios Associated with Pigment Red 144/214

The purpose of this Memorandum is to request additional information to support the inhalation exposure and volatilization factor calculations related to total PCBs in carpeting as presented in Clariant's Revised "Exposure and Screening-Level Risk Assessment for Carpet Fiber and Food Wrap Scenarios Associated with Pigment Red 144/214" (April 11, 2005).

Owing to uncertainty in appropriate values for certain parameters that were used in exposure/risk calculations, it is important to understand the relative contributions of different exposure routes to total dose estimates. If, for example, the dominant exposure route (or routes) is one for which there is considerable uncertainty in one or more of the parameters used to calculate dose, then it may be important to examine that route more closely.

In Table 3 of the April 11, 2005, report prepared by BBL Sciences for Clariant Corporation, the acceptable concentration of tPCBs in carpet fiber is relatively insensitive to the retention factor used for the inhalation route of exposure. It was stated in the conference call on June 16, 2005, that this insensitivity is because inhalation makes only a minor contribution to the total dose. Versar requests that Clariant/BBL support this contention via calculation of the total dose and contributions of each exposure route, in mg/kg/day, for an illustrative case. Once the values have been shown for the illustrative case, it should be a simple matter for any of the parties to calculate values for other cases and thereby assess sensitivity for any route of interest.

For the illustrative calculation, it is recommended that Clariant/BBL use current worst-case estimates of 100 for the bioavailability factor and 0.01 for the retention factor, along with an assumed tPCB concentration in carpet fiber of 16.4 mg/kg, which was stated in the BBL report to be the maximum expected concentration. Values should be listed for each parameter used in the dose calculation for each route. Most of these values were shown in Table 1 of the BBL report, but certain intermediate calculations such as the volatilization factor were not shown.

Please feel free to contact me if you have any questions or comments.